

From: Vyas, Himanshu
Sent: Thursday, March 29, 2018 08:10 PM
To: Kaleri, Cynthia; Mia, Marcia
CC: North, Alexis; Beeler, Cindy; Sorrell, Virginia
Subject: RE: Manufacturer Tested Controls

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Himanshu Vyas
Environmental Engineer
U.S. EPA, Region III
Office of Permits and State Programs (3AP10)
1650 Arch Street

Philadelphia, PA 19103-2029

Phone: 215-814-2112

FAX: 215-814-2134

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Kaleri, Cynthia
Sent: Thursday, March 29, 2018 3:05 PM
To: Vyas, Himanshu <vyas.himanshu@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Cc: North, Alexis <North.Alexis@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>

Subject: RE: Manufacturer Tested Controls

Ex. 5 Deliberative Process (DP)

Cynthia J. Kaleri

Enforcement Officer, EPA Region 6

Phone (214) 665-6772

Mailing Address

Attention: Cynthia J. Kaleri (6EN-AA)

United States Environmental Protection Agency

1445 Ross Avenue

Dallas, TX 75202-2733

This email may contain material that is confidential, privileged, and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: Vyas, Himanshu

Sent: Thursday, March 29, 2018 1:52 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: North, Alexis <North.Alexis@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>

Subject: FW: Manufacturer Tested Controls

Sorry to bug you all on another question on applicability on the existing NSPS 0000a even as we all are busy working on the proposed revision.

The gist of the question is: since the NSPS 0000a requires manufacturer guarantee of 95% or greater DRE in order to avoid testing of enclosed combusters, is it implied that so long as a combustor meets 95% DRE the technology standard to be set by the state in the state permit should be 95% and not greater even though most such combusters apparently meet as high as 99%?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks,

Himanshu Vyas
Environmental Engineer
U.S. EPA, Region III
Office of Permits and State Programs (3AP10)
1650 Arch Street

Philadelphia, PA 19103-2029

Phone: 215-814-2112

FAX: 215-814-2134

"This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies."

From: Boritz, Charles [mailto:cboritz@pa.gov]

Sent: Thursday, March 29, 2018 1:01 PM

To: Vyas, Himanshu <vyas.himanshu@epa.gov>

Cc: Ramamurthy, Krishnan <kramamurth@pa.gov>; Bhatt, Naishadh <nabhhatt@pa.gov>;
Trivedi, Virendra <vtrivedi@pa.gov>

Subject: Manufacturer Tested Controls

Himanshu,

As part of our GP-5/GP-5A BAT determination for enclosed combustion devices, the Department established a 98% or greater control efficiency for certain emission sources based on vendor data. However, in conversation with operators in the industry, they stated that their preference is to use manufacturer tested models because it saves them significant money by removing the performance test requirement after startup and after every five years.

In 40 CFR §60.5413a(d)(11)(iii) it states "A manufacturer must demonstrate a destruction efficiency of at least 95 percent for THC, as propane. A control device that demonstrates a destruction efficiency of 95 percent for THC, as propane, will meet the control requirement for 95 percent destruction of VOC and methane (if applicable) required under this subpart." Some of the submitted test data (Big Iron Oilfield Services' BNECU-PI36 and BNECU-PI48 from the ttn website) and manufacturers' statements on destruction efficiency on the models I've checked so far show destruction efficiencies of 99% or greater.

My question is, does the certification process only certify a model to the 95% requirement from 40 CFR §60.5412a(a)(1) and §60.5412a(d)(1), or does it certify the model to the measured destruction efficiency?

The concern is that the operators would like to continue using the manufacturer tested controls, but unless the certification was to the actual reported destruction efficiency, they could not meet the Department's 98% requirement without having to do the required performance testing. As stated on one of the manufacturer's website, "US EPA Certified models ... allow you to by-pass Quad Oa required emission testing of your units after 180 days of installation saving over \$7,000 per test required plus the costs of filing results with the EPA."

Thank you,

Charles Boritz | Air Quality Engineering Specialist

Department of Environmental Protection | Technical Support Section

400 Market St. | Hbg PA 17101

Phone: 717.772.3977 | Fax: 717.772.2303

www.depweb.state.pa.us